

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

HERITAGE GUITAR, INC.,

Case No. 20-cv-229

Plaintiff,

Honorable Janet T. Neff

v.

Magistrate Judge Ray Kent

GIBSON BRANDS, INC.,

Defendant.

**PLAINTIFF’S UNOPPOSED MOTION TO ALLOW PLAINTIFF TO EXCEED
THE PAGE LIMIT ESTABLISHED BY THE COURT’S JULY 20, 2020 ORDER**

NOW COMES Plaintiff, Heritage Guitar, Inc. (“Heritage”), by and through its attorneys, VARNUM LLP, and files this Unopposed Motion to Allow Plaintiff to Exceed the Page Limit Established by the Court’s July 20, 2020 Order in connection with Gibson Brands, Inc.’s (“Gibson”) motion to dismiss or to transfer venue. Specifically:

1. Plaintiff seeks permission to file its opposition memorandum in accordance with Western District of Michigan Local Rule 7.2(b), which allows an opposition memorandum total up to 10,800 words. The Court’s July 20, 2020 Order limits Plaintiff’s response to twenty (20) pages.

Heritage’s proposed opposition memorandum totals 10,714 words and 33 pages. Thus, while it exceeds the page limit set in the Court’s July 20 Order, it complies with the word limit set in Local Rule 7.2(b). Heritage requires the additional pages to adequately address the complex and numerous issues raised in Heritage’s complaint and Gibson’s alternative motions, each of which involves multi-factor tests for the Court to consider. Gibson has indicated that it does not oppose the request.

In accordance with the Court’s Order, (Doc. 33), attached as Exhibit 1 to the instant motion is Heritage’s opposition memorandum, which has been redacted to protect references to

the 1991 Settlement Agreement, which the Court previously allowed to be filed under seal in its entirety, (Doc. 22). Should the Court grant the instant motion, Heritage respectfully requests that it be permitted to file an unredacted version of its opposition memorandum under seal.

WHEREFORE, Plaintiff respectfully requests that this Court grant its Unopposed Motion to Allow Plaintiff to Exceed the Page Limit Established by the Court's July 20, 2020 Order.

Respectfully submitted,

Dated: September 22, 2020

Attorneys for Plaintiff

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